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THE LEAGUE OF WOMEN VOTERS OF ROCKFORD

COMMENTS ON EPA PROPOSED PLAN FOR THE PAGEL'S PIT SUPERFUND SITE, April, 1991

Preferred Alternatives 5 and 6

Alternative 5a is a better alternative than 5 because, as stated onpp.4-34 of the Remedial Investigation Report, March, 1991: " Of the alternatives which involve containment and groundwater treatment, Alt.5a (and 7a) which treat both the groundwater and leachate by activated carbon adsorption are the only alternatives which would reduce both toxicity and volume by destroying most of the VOC's and SVOC's."

Both the groundwater and leachate would be treated on site by carbon adsorption preceded by sand filtration. The leachate would be pretreated for removal of turbidity, solids and inorganics by ph adjustment, precipitation, flocculation, and sedimentation. Alternative 5 would be less complicated because it does not include precipitation processes, but this would make it less effective.

According to the Feasibility Study, page 4-37, Alt.5a is expected to be one of the simplest to construct and operate, because it does not involve discharging leachate to the POTW for treatment. An added advantage of this is that"future U.S. EPA pretreatment regulations could include effluent standards for hazardous waste disposal sites, including leachate from landfills. NPDES and pretreatment regulations expected to be promulgated by U.S. EPA in the future could place more restrictions on the effluent that can be accepted by the POTW." Such regulations should be anticipated in the selection of the best alternative.

5a is one of the alternatives that would be slower to implement because of the need for Pilot trials. It could also expose workers to some hazardous material, but this could be mitigated by personal protective equipment. These drawbacks are also attached to other alternatives and are not major problems.

Alternatives 6 and 6a do not include the advantages of 5a and should not be used because plans state that, "the Toxicity of the VOC's emitted to the atmosphere would be reduced by Natural dispersion mechnisms." According to p. 4-35 in the Feasibility Report, "Alernatives 6 and 6a (or 7a) pose higher potential risk to the surrounding community than Alternatives 5,4,2, and 7a, since untreated VOC's could be emitted to the atmosphere.

Page 4-35 of the Feasibility Report states that "limited toxicity reduction would be realized by Alt.6a as a result of the activated carbon adsorption polishing step. It would achieve an equivalent reduction in toxicity as 5a if applicable air emission ARARs require the use of vapor phase carbon adsorption and subsequent off-site regeneration of spent carbon. 6a might be considered if this could be part of the requirements.

One of the main problems with Alt. 6 and 6a is that there is no reliable data on ambient air pollution testing at the site, according to U.S.EPA Region V Air and Radiation Div.,Wm. Beyer, 11/5/90. "My concern is that the limited sampling, particularly with possible bias of the results may not be adequate to support the conclusions that the ambient air doses not pose a health hazard at this 60 acre site. I also note that one of the potential remedial treatments involves air stripping of the groundwater. This process would transfer additional contamination to the air from the contaminated water and there would be an even greater question, I feel, as to the representative quality of the ambient air."

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Common Elements of the Alternative Remedial Plans

The Common Elements of the plans which include gas extraction system upgrading, groundwater extraction systems and deed restriction for property development on and adjacent to the landfill, as well as review every 5 years and continued monitoring seem adequate, at least for the short term. In the long term they may be subject to societal and environmental changes.

A change should be made in the plans for an Illinois Sanitary landfill final cover to use of a clay synthetic membrane cap (as in Alt. 3) RCRA Subtitle C hazardous waste cap to reduce the infiltration of water into the wastes to very low levels and therefore reduce the amount of leachate, which could be increased by long term susidence.

Comments on the Overall Protection of Human Health and the Environment, Criteria 1

The Health Risk analysis does not include other health effects besides cancer, which include non-fatal tumors, birth and genetic defects and diseases, such as those affecting kidney and liver functions that may be caused by toxic/hazardous chemicals in the landfill.

Cumulative and synergistic effects on human health and in the environment also need to be considered. Bioaccumulation seems to be ignored when calculating risk of contamination from Kilbuck Creek.

COMMENTS FROM U.S EPA ABOUT THE PAGEL"S PIT SITE

Comments from U.S. EPA Judy Keiman, RCRA/CERCLA Liason and Dale S. Bryson, Water Div. Director suggest that listed waste disposed of in the WRL and or in Acme Solvent Superfund site are the sources of contamination. Bryson considers alkaline earth metals which are naturally occuring as a source of contamination but doesn't consider other sources, such as those suggested by Stephen M. Johnson Geologist, PCB Control Section.* He questions the effectiveness of the groundwater monitoring program from a hydrogeological perspective, and says that "the AAD document does not include direct reference to a formal effort to establish the effectiveness .... but includes a cursory examination of the geology as presented in the document (which) says that the geologic picture is simple enough to make the monitoring network look adequate." If any of the alternatives are to be adequate, a good monitoring system must be carefully structured.

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"Records indicate that the landfill is still receiving solid municipal wastes and dewatered sewage treatment sludges and that it received limited quantties of "special" wastes in the past. There is no landfill drilling or information as to the source of the PCBs detected in the leachate but it is reasonable to point to the sludges as being a likely candidate." Records of the Sanitary District sludges deposited in the Pagel's Pit landfill will show that they have been problems.

The problem is that municipal landfills accept wastes that are exempted from regulation, such as Household and other small generator hazardous wastes and "special wastes." As defined p. 11, Special Wastes in IL regulations, "any industrial process waste, pollution control waste, or hazardous waste, except as determined pursuant to the IL Envrionment Protection Act." 3 new request for permits were recently filed for disposal of special wastes in Pagel's Pit, 3/18/91 and 4/18/91. Regulations need to be changed to exclude these wastes, recycle and/or reduce and reuse these toxic materials so that they do not contaminate our land, air and water.

Thank you for the opportunity to present these comments.

Betty Johnson

Betty, Johnson, Natural
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